

PERMIT CHECK LIST

The following people have reviewed the permit:

Reviewing Permit Writer: _____

Air Compliance Manager: _____

Date: September 7, 2012

Source Name: Sorrentino Mariani & Company, Inc. Registration No: 61347 Id. No.: 51-710-00267

Source Location: 2701 St. Julian Ave., Norfolk, Virginia

Mail Address: 2701 St. Julian Avenue, Norfolk, Virginia, 23509

Source Status: Greenfield ✓ Currently operating

Source Classification: Minor ✓ SynMinor State Major PSD Major TV Major

Permit Action: (Describe new/modified equipment and/or processes, include maximum rated capacities) The facility submitted an application to reduce their throughput limits and have their permit updated to reflect current requirements for HAP monitoring and recordkeeping.

✓ **Inspector Contacted Consulted**

Permit Action Program:

✓ SOP

Permit Action Type:

✓ New

Y (Y/N) Permit Includes All Emission Units at Source.

Y (Y/N) Permit Allows Source to avoid Title V/MACT/etc.

After this permit, source is: ✓ Synthetic minor (SM), for PM/PM₁₀, VOC and HAPs Pollutants

Permit Application Review

✓ Permit application submitted, or Letter Request

Application Received Date: May 11, 2012

Application Complete Date: September 6, 2012

Permit Deadline Date: March 5, 2013

✓ Document Certification Form received

n/a Confidential information with sanitized copy. If yes, which sections:

n/a Copy of letter from local official for greenfield, or major modified sources

n/a Copy of letter sent to FLM if applicable. (Comments)

n/a Notification of Affected State(s)

This permit supersedes the NSR permit dated December 26, 2001.

Regulatory Review

BACT Determination (check one):

 [Control Strategy/Equipment] @ % efficiency for the control of meets BACT, or

✓ TV/SOP/BACT not applicable. (Explain) This action is a new SOP to keep the source a synthetic minor source and to limit the emissions of HAPs.

N (Y/N) NSPS/MACT/NESHAPS Applicability: If Y, Subpart(s):

 NSPS

 MACT

 NESHAPS

N (Y/N) Existing Rules (9 VAC 5 Chapter 40) Applicability: If Y, Rule(s):

Toxic Pollutants (check one):

 Exempt, or ✓ in compliance with 9 VAC 5-60-220, or not evaluated.

Modeling:

✓ Attached (including background monitors), etc.) Screen model to prove that the PAAC of Formaldehyde does not exceed the SAAC

Regulatory Review (cont.)

Site Suitability:

☒ Site suitable from an air pollution standpoint, inspection date September 9, 2011 and site visit 7/11/12.

☒ Calculation sheet(s) attached

n/a (Y/N) NSR Netting Comments (Explain Permit History):

n/a (Y/N) (CAM) Compliance Assurance Monitoring Applicable

Permit includes: ☐ Stack Testing ☐ CEM ☐ VEE by source

Public Participation

Y (Y/N) Public Noticed. In the Virginian Pilot from September **XX** to October **XX**, 2012

N (Y/N) Public Notice Comments.

N (Y/N) Public Hearing.

EPA Review

N (Y/N) EPA Review.

N (Y/N) EPA Comments.

Comments: Sorrentino Mariani is a facility that manufactures wooden furniture for the US government and the hotel industry. The furniture (headboards, dressers, bathroom vanities, etc.) is custom made in their wood working shop and then stained and lacquered in the painting area. The woodworking shop has saws and sanders that are controlled by a central dust collection system with fabric filters. The collection system then vents inside the building, so this part of their operation does not need to be permitted. The painting area is actually a series of hooded painting areas, each of which has a specific function. The facility was originally permitted in 1999 with a minor NSR permit and the permit was amended in 2001. The 2001 NSR permit is their current permit.

Emission Unit/Process Description: The painting area is a series of hooded painting areas. There are 5 major parts of this area: the application of NGR materials (1), the application of stains (2), the application of sealers (3), the first coat of lacquer (4) followed by time in an electric drying oven, and finally the application of the final layer of lacquer (5a) with a touch up area (5b) followed by another electric drying oven. The facility also has a sample booth (6) that is dedicated to testing coating samples. The throughput of the type of coating will take into consideration any coatings sprayed in the sample booth. All furniture to be coated is put on dollies which are connected to a small single rail track and they are pulled from booth to booth via this track.

Regulatory Review:

Article 6 and Article 5: This request by the facility is a request to reduce the overall throughput of coatings and thinners used at the facility, but more importantly to also change the recordkeeping and monitoring requirements for the HAPs in those coatings. The reduction in throughputs and the changes to the monitoring and recordkeeping in the permit is a significant amendment to the permit under Article 6 because this results in a change to a case-by-case decision and we will be allowing less stringent monitoring and recordkeeping. However, because the source has requested to stay a synthetic minor source for HAP emissions (<10 ton per year of any single HAP and < 25 ton per year of any combination of HAP), we are rolling this NSR significant amendment into a State Operating Permit so the HAP limit will be federally enforceable. This action is a new State Operating permit to keep the facility a synthetic minor source of both criteria pollutants and HAPs.

Regulatory Review (cont.)

The facility has requested to have different throughput limits for different types of coatings. So the permit will have throughput and emission limits as follows:

Type of Coating	Throughput limit	PM lb/hr	PM ton/yr	VOC lb/hr	VOC ton/yr
NGR coatings	5000 gal/yr	3.2	5.4	8.2	13.6
Wipe Stains	4500 gal/yr	1.6	2.8	7.1	12.7
Sealer coatings	4000 gal/yr	0.9	1.9	5.6	11.2
Lacquer coatings	6300 gal/yr	0.7	3.2	10.8	15.9
Solvents and Pad Stains	6020 gal/yr	-	-	163.4	17.0

The previous permit had a throughput limit of 28,000 gallons of coatings and thinners (combined). This action will have a total throughput of 25,820 gallons of coatings and thinners combined. To calculate the emission limits, all the coatings and thinners were re-evaluated because the information from 2001 was no longer accurate. As a result, there are now multiple emission limits by type of coating in the permit.

The facility uses coatings which contain Hazardous Air Pollutants (HAPs), so an analysis of their HAP emissions was done. The potential emissions of HAPs will not exceed any hourly level, however, the annual emissions for Formaldehyde have the potential to exceed the annual exemption level, therefore, in accordance with the guidance (Overview of Federal Hazardous Air Pollutant (HAP) and State Toxics Programs dated March 25, 2008), Screen3 modeling was done to show that the Predicted Ambient Air Concentration (PAAC) of Formaldehyde is less than the Significant Ambient Air Concentration (SAAC) (see attached modeling). The annual emission limit for Formaldehyde has been put in the State Only Enforceable section of the permit.

Article 8 – This facility is taking a limit to remain a synthetic minor source so this regulation is not applicable.

NSPS, NESHAP and MACT applicability – There are no NSPS or NESHAP regulations that apply to this type of source. There is a MACT (Subpart JJ) that is applicable to major sources, but this source is taking a limit to remain a synthetic minor source, so the MACT will not apply.

BACT – Because the facility is actually reducing their throughputs and therefore their emissions, BACT is not applicable to this permit action.

Summary of Actual Emission Changes: - The facility was previously permitted with a throughput of 28,000 gallons of coatings and thinners annually. Their emission limit was 93.0 tons/year. The new throughput limits have been broken down by type of coating and the overall facility VOC limit will be 70.5 tons/year. This is a 22.5 ton/yr reduction in VOC allowables. The facility did not have a PM/PM10 emission limit, but this permit has included the particulate emissions allowing the facility a 50% transfer efficiency and a 95% control efficiency for each booth. The new PM/PM10 limits are listed in the table above with the throughputs. The facility total emissions will be 13.2 ton/yr PM/PM10. The permit will also have a limit for the amount of individual HAP (9.4 tons/yr) and combined HAPs (24.4 tons/yr) the facility can emit in any 12-month rolling period to keep the facility a synthetic minor source of emissions. Formaldehyde has an emission limit in the State Only Enforceable section of the permit.

Final Recommendation: Recommend Approval.

Regulatory Review (cont.)

Permit Writer's Signature:

Air Permit Manager's Signature:



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

5636 Southern Boulevard, Virginia Beach, Virginia 23462

(757) 518-2000 Fax (757) 518-2009

www.deq.virginia.gov

Doug Domenech
Secretary of Natural Resources

David K. Paylor
Director

Maria R. Nold
Regional Director

September 7, 2012

Virgil R. Mariani
President
Sorrentino Mariani and Company, Inc.
2701 St. Julian Ave.
Norfolk, VA 23504

Location: Norfolk
Registration No.: 61347
AFS Id. No.: 51-710-00267

Dear Mr. Mariani:

Attached is a permit to operate a wood furniture manufacturing facility in accordance with the provisions of the Virginia State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. This permit supersedes your permit dated December 26, 2001.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

In the course of evaluating the application and arriving at a final decision to approve the project, the Department of Environmental Quality (DEQ) deemed the application complete on September 6, 2012, and solicited written public comments by placing a newspaper advertisement in the Virginia Pilot on XXXXXX. The required comment period, provided by 9 VAC 5-80-1170 D expired on XXXXXXXX.

This permit approval to operate shall not relieve Sorrentino Mariani and Company, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218-1105

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Laura D. Corl by phone at (757) 518-2178 or by e-mail at laura.corl@deq.virginia.gov.

Sincerely,

Troy D. Breathwaite
Regional Air Permits Manager

TDB/LDC/61347_002_12_SOPnew_SorrentinoMariani.docx

Attachment: Permit

cc: Manager, Data Analysis (electronic file submission)
Manager/Inspector, Air Compliance
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III (electronic file submission)



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Doug Domenech
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David K. Paylor
Director

Maria R. Nold
Regional Director

STATIONARY SOURCE PERMIT TO OPERATE

This permit supersedes replaces your permit dated December 26, 2001.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Sorrentino Mariani & Company, Inc.
2701 St. Julian Avenue
Norfolk, Virginia 23504
Registration No.: 61347

is authorized to operate

a wood furniture manufacturing facility

located at

2701 St. Julian Ave,
Norfolk

in accordance with the Conditions of this permit.

Approved on: **Draft**.

Maria R. Nold

Signature Date

Permit consists of 7 pages.
Permit Conditions 1 to 22.

INTRODUCTION

1. This permit approval is based on the permit application dated July 22, 1998 and May 11, 2012, including amendment information dated September 21, 1998, December 22, 1998, February 21, 2001, and November 30, 2001, and supplemental information dated June 28, 2012, August 14, 2012, September 4, 2012 and September 6, 2012. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

2. **Equipment List** - Equipment at this facility consists of the following:

Equipment permitted prior to the date of this permit				
Reference No.	Equipment Description	Rated Capacity	Federal Requirements	Original Permit Date
Booth 1	NGR application booth with Binks 8 gallon pressure pot	7.5 gal/hr	None	2/10/99
Booth 2	Wipe stain booth with Binks 8 gallon pressure pot	7.5 gal/hr	None	2/10/99
Booth 3	Sealer application booth with Kremlin Air Mix Xcite	7.5 gal/hr	None	2/10/99
Booth 4	1 st Laquer application booth with Kremlin Mux	7.5 gal/hr	None	2/10/99
Booth 5a	Final Laquer application booth with Graco G15 AA series HVLP	7.5 gal/hr	None	2/10/99
Booth 5b	Final Laquer application booth with Graco G15 AA series HVLP	7.5 gal/hr	None	2/10/99
Booth 6	Sample spray booth with Devilbiss Cup Gun	1 gal/hr	None	2/10/99

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.

(9 VAC 5-80-850)

3. **Emission Controls** - Particulate emissions from the application booths (1-6) shall be controlled by dry filter media rolls and techniques to minimize overspray. Each paint booth and dry filter shall be provided with adequate access for inspection and shall be in operation when the process line is operating.
(9 VAC 5-80-850 and 9 VAC 5-50-260)
4. **Fugitive Dust and Fugitive Emission Controls** – Fugitive dust emission controls shall include the installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sanding or other similar operations.
(9 VAC 5-80-850, 9 VAC 5-50-90 and 9 VAC 5-50-260)
5. **VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9 VAC 5-80-850, 9 VAC 5-50-20 F and 9 VAC 5-50-260)
6. **Monitoring Devices** – Each spray booth dry filter shall be equipped with a monitoring device to continuously measure the differential pressure drop across the dry filter. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when any spraying or sanding is taking place.
(9 VAC 5-80-850, 5-50-20C and 9 VAC 5-50-260)
7. **Monitoring Device Observation** – To ensure good performance, the monitoring device used to continuously measure the pressure drop across each filter shall be observed by the permittee with a frequency of not less than once per day. The permittee shall keep a log (date, time, reading, booth # and any action taken) of the observations from the device.
(9 VAC 5-80-850)

OPERATING LIMITATIONS

8. **Throughput** - The throughput of coatings and thinners shall not exceed the limits specified in the table below, calculated monthly as the sum of each consecutive 12-month period.

Type of Coating	Throughput limit
NGR coatings	5000 gal/yr
Wipe Stains	4500 gal/yr
Sealer coatings	4000 gal/yr
Lacquer coatings	6300 gal/yr
Solvents and Pad Stains	6020 gal/yr

Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. (9 VAC 5-80-850)

EMISSION LIMITS

9. **Process Emission Limits** - Emissions from the operation of the spray paint booths shall not exceed the limits specified below:

Type of Coating	PM lb/hr	PM ton/yr	VOC lb/hr	VOC ton/yr
NGR coatings	3.2	5.4	8.2	13.6
Wipe Stains	1.6	2.8	7.1	12.7
Sealer coatings	0.9	1.9	5.6	11.2
Lacquer coatings	0.7	3.2	10.8	15.9
Solvents and Pad Stains	-	-	163.4	17.0

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number 8.(9 VAC 5-80-850 and 9 VAC 5-50-260)

10. Facility wide Emission Limits - Total emissions from the wood furniture coating operations shall not exceed the limits specified below:

Particulate Matter (PM/PM ₁₀)	13.2 tons/yr
Volatile Organic Compounds	70.5 tons/yr
Any single HAP	9.4 tons/yr
Combination of all HAP	24.4 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 8 and 12c.(9 VAC 5-80-850)

11. Visible Emission Limit - Visible emissions from each spray paint booth shall not exceed 5% opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.(9 VAC 5-80-850 and 9 VAC 5-50-260)

RECORDS

12. On Site Records - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

- Annual throughput, in gallons, of each type of coating as specified in Condition 8, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), showing the VOC content, HAP content and solids content for each coating or thinner used.
- Annual HAP emissions, in tons, for each HAP and all HAPs combined used in the spray paint booth operations. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- Control device monitoring records for the spray paint booths as required in Condition 7.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-850 and 9 VAC 5-50-50)

13. Emission Testing - The wood furniture coating operation shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested and safe sampling platforms and access shall be provided.
(9 VAC 5-80-880 and 9 VAC 5-80-850)

GENERAL CONDITIONS

14. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:
- To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
 - To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
 - To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
 - To sample or test at reasonable times.
- For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-850)
15. **Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9 VAC 5-20-180 J and 9 VAC 5-80-850)
16. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Tidewater Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Tidewater Regional Office in writing.
(9 VAC 5-20-180 C and 9 VAC 5-80-850)
17. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-850)

18. **Maintenance/Operating Procedures** – At all times, including periods of start-up, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.(9 VAC 5-50-20 E and 9 VAC 5-80-850)
19. **Permit Suspension/Revocation** - This permit may be revoked if the permittee:
- a. Knowingly makes material misstatements in the permit application or any amendments to it;
 - b. Fails to comply with the terms or conditions of this permit;
 - c. Fails to comply with any emission standards applicable to a permitted emissions unit;
 - d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;
 - e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application for this permit is submitted;
 - f. Fails to comply with the applicable provisions of Articles 6, 8 and 9 of 9 VAC 5 Chapter 80.
- (9 VAC 5-80-1010)
20. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Tidewater Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-940)
21. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)

STATE-ONLY ENFORCEABLE REQUIREMENTS

22. **Facility wide Emission Limit** - Formaldehyde emissions from the coating operations shall not exceed the limit specified below:
- | | |
|--------------|-------------|
| Formaldehyde | 0.3 tons/yr |
|--------------|-------------|
- These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number 8.(9 VAC 5-80-850 and 9 VAC 5-50-260)

DRAFT PERMIT APPROVAL FORM

Department of Environmental Quality
Tidewater Regional Office
5636 Southern Blvd.
Virginia Beach, Virginia 23462

Instructions:

The "Draft Permit Approval Form" provides the owner or certified company official an opportunity to accept or suggest appropriate changes to a draft permit. If a signed form is not received within one (1) week of the date of receipt of the draft permit, DEQ will assume that the draft permit is considered acceptable and will proceed with processing the permit.

Please check the applicable statement(s) below after thoroughly reviewing the draft permit.
Scanned forms (with signatures) may be returned to laura.corl@deq.virginia.gov or troy.breathwaite@deq.virginia.gov.

If scanning is not available, please fax to 757-518-2009, Attention: Ms. Laura D. Corl or Mr. Troy D. Breathwaite.

_____ The owner or certified company official agrees with the conditions of the draft permit dated _____ . Please proceed to issue the permit with no change.

_____ The owner or certified company official finds condition number(s) _____ of the draft permit dated _____ unacceptable.

_____ The suggested changes are attached for your consideration.

_____ The owner or certified company official requests further discussion with DEQ regarding the above referenced condition(s).

Signature: _____

Name: _____

Title: _____

Facility: _____

Date: _____